

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO MODIFY CONDITIONS
OF RELEASE**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order modifying the current conditions of release which prohibit him from flying an aircraft without first receiving an order from the Court.

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.

2. Pursuant to the current terms and conditions of release, Mr. Reid may fly an airplane so long as the Court enters an order allowing him to do so.

3. Undersigned counsel and the government, by and through Assistant United States Attorney James Braun, have agreed that for the purposes of judicial economy, Mr. Reid's conditions regarding traveling out of the state of Arizona and flying a plane be modified to the following:

- a. Mr. Reid may be able to fly an airplane without a court order so long as both his pre-trial services agency officers in Arizona, Suzette Frisby, and New Mexico, Nick Romero, indicate they have no objection to said flights.
- b. Mr. Reid may be able to travel out of the state without a court order so long as both his pretrial services agency officers in Arizona, Suzette Frisby, and New Mexico, Nick Romero, indicate they have no objection to said travel.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order modifying his release conditions as set forth above.

RESPECTFULLY SUBMITTED this 10th day of July, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
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(480) 968-8700

I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 10th day of July, 2006.

/s/ electronically signed

Nick Romero
Pretrial Services Agency—New Mexico
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Suzette Frisby
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